

**TIFFANY & BOSCO**  
P.A.

**2525 EAST CAMELBACK ROAD  
SUITE 300  
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Mark S. Bosco  
State Bar No. 010167  
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State Bar No. 014228  
Attorneys for Movant  
10-55620

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE:

Amaray De La Rosa  
Debtor.

Wells Fargo Bank, N.A.  
Movant,  
vs.

Amaray De La Rosa, Debtor; Jill H. Ford, Trustee.  
Respondents.

No. 2:10-bk-40168-SSC

Chapter 7

**NOTICE OF FILING MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY AND  
REQUIREMENT TO FILE**

RE: Real Property Located at  
1295 N. Ash St.  
# 614  
Gilbert, AZ 85233

NOTICE IS HEREBY GIVEN that the above Movant has filed a motion requesting relief from the automatic stay, the details of which are as follows:

Movant asserts that there is no equity in the property, which is the subject of the Motion for Relief from Stay, and/or Respondent has not provided Movant with adequate protection with respect to such property. Therefore, Movant is entitled to an Order Lifting Stay with respect to such property.

FURTHER NOTICE IS HEREBY GIVEN that pursuant to Local Bankruptcy Rule 4001 if no objection is filed with the court and a copy served on Movant whose address is:

1 Wells Fargo Bank, N.A.  
2 c/o Mark S. Bosco, Esq.  
3 2525 East Camelback Road, Suite 300  
4 Phoenix, Arizona 85016

5  
6 WITHIN 14 DAYS of service of the motion, the motion for relief from the automatic stay may be  
7 granted without further hearing.

8  
9 FINALLY, Movant's Counsel certifies that a letter was sent seeking to resolve the issues  
10 necessitating the motion, to Debtor's Counsel or the Debtor if the Debtor is without counsel and that  
11 after sincere effort the parties have been unable to resolve the matter, and the letter was sent at least  
12 five (5) business days prior to the filing of the motion.

13  
14 FINALLY, Movant's Counsel certifies that a letter was not sent seeking to resolve the issues  
15 necessitating the motion, as the Debtor has indicated that they are surrendering their interest in the  
16 property or the property is not the Debtor's main residence.

17  
18 DATED this 25th day of January, 2011.

19  
20 TIFFANY & BOSCO, P.A.

21  
22 BY /s/ LJM # 014228

23 Mark S. Bosco  
24 Leonard J. McDonald  
25 Attorneys for Movant

26  
27 Copy of the foregoing was  
28 mailed on January 25, 2011, to:

29 Amaray De La Rosa  
30 1520 S. Chestnut Circle  
31 Mesa, AZ 85204  
32 Debtor

33 Carlene M. Simmons  
34 80 E. Rio Salado Parkway  
35 Suite 401  
36 Tempe, AZ 85281  
37 Attorney for Debtor

38 Jill H. Ford  
39 P.O. Box 5845  
40 Carefree, AZ 85377  
41 Trustee

42 U.S. Trustee  
43 230 North 1<sup>st</sup> Avenue, Suite 204  
44 Phoenix, AZ 85003-1706

45 By: Julie Purvis